



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

DEC 2 1999

Ref. No. 99-0246

Mr. Christopher Swift
Quintiles Simirex
12000 Commerce Parkway
Mt. Laurel, NJ 08054

Dear Mr. Swift:

This is in response to your letter dated August 25, 1999, regarding markings on non-bulk specification packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if a packaging manufactured in 1994 and marked "94" must be used prior to the re-test date (12 months for single and composite packagings and 24 months for combination packagings (§ 178.601(e))).

The answer is no. A packaging manufactured prior to the re-test date may be used at any time to transport a hazardous material for which it is authorized. Non-bulk specification packagings do not "expire." However, the shipper must determine that the packagings has been manufactured, assembled, and marked in accordance with the HMR (§ 173.22(a)) and, if used more than once, must comply with § 173.28.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



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Edward Mazzullo, Director OHMS
US DOT/RSPA (DHM-10)
400 7th St. SW
Washington D.C. 20590

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Mr. Mazzullo,

I am requesting written clarification regarding possible expiration dates on UN packaging. A carrier (World Courier) informed me that the UN-specification packaging we are shipping product in is "expired," and they refused to handle the shipment. I know of know such regulation, other than how it applies to repackaging.

The boxes we are shipping were specifically designed for the product they carry, and have the designated markings:

4G/X10/S/94

The "94" being the year of manufacture, I was told the boxes were past their two-year usability date. Additionally, commercial airlines would refuse them for transport. Is this accurate? Please send me clarification as to whether or not the packaging is indeed "expired," or if I am still able to use these containers. Thank you for your assistance in this matter.

Regards,

Christopher Swift
Manager, Shipping/Receiving/Materials
Quintiles Simirex
12000 Commerce Parkway
Mt. Laurel, NJ 08054
Tel: (856) 235-2333
Fax: (856) 727-0924